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## COMMENTS

On April 25, 2002, Central Texas College filed a petition requesting the institution of a rulemaking proceeding to amend Section 73.622(b) of the Commission's rules -- the Digital Table of Allotments -- by substituting Channel 38 for Channel 47c, Belton, Texas, and to modify the authorization for KNCT-DT to specify operation on Channel 38. As explained in the Petition, the channel substitution would significantly increase the population and coverage area served as compared to the original Channel 47c allotment. The substitution would further

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serve the public interest because the channel change will eliminate interference issues and technical restraints that are related to the current paired allotments for Central Texas College. KNCT-TV operates on NTSC Channel 46, and DTV operation on Channel 47c will likely cause interference to the station's NTSC operations if the antenna patterns are not precisely matched. Similarly, this "upper-adjacent DTV" is technically demanding and requires complex combining equipment and meticulous adjustment to remain stable, a situation that is not desirable for a station with limited resources.

In its Petition, Central Texas College demonstrated that digital Channel 38 can be substituted for digital Channel 47c at coordinates 30-59-08 N and 97-37-51 W consistent with community coverage requirements. The substitution also complies with the interference requirements of Section 73.623(c)(2) of the Commission's Rules, which provides that a petition to modify the DTV Table of Allotments must demonstrate that the requested change will not result in more than an additional 2 percent of the population served by another station being subject to interference; provided, however that no new interference may be caused to any station that already experiences interference to 10 percent or more of its population. *See Amendment of Section 73.622(b) (Charleston, South Carolina)*, 17 FCC Rcd 4225 (2002). The proposed digital Channel 38 allotment is in full compliance with the 2 percent/10 percent interference criteria.

In response to the Petition, the Commission issued the NPRM in which it concluded that Central Texas College's proposal warrants consideration. Accordingly, the Commission proposed to substitute DTV Channel 38 for DTV Channel 47c for Station KNCT-DT at Belton, Texas.

Central Texas College urges the Commission to implement the channel exchange as proposed in the NPRM without delay and to modify the authorization for KNCT-DT to

specify operation on Channel 38. Central Texas College hereby affirms its commitment to file an application to specify the new channel proposed herein and, if authorized, promptly construct its DTV facilities

Respectfully submitted,

CENTRAL TEXAS COLLEGE

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